

# EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT GREENEVILLE**

**RAY WHITSON and ELLISA WHITSON,** )  
 )  
 **Plaintiff,** )  
 )  
 v. )  
 )  
 **PORTFOLIO RECOVERY ASSOCIATES LLC,** )  
 **MERYL DREANO, CHRISTOPHER DAVES,** )  
 **and MCLEMORE & EDINGTON, PLLC,** )  
 )  
 **Defendants.** )

**CIVIL ACTION NO.  
2:12-cv-00131**

**DECLARATION OF MERYL DREANO**

Pursuant to 28 U.S.C. § 1746, I, Meryl Dreano, state as follows:

1. My name is Meryl Dreano. I am over twenty-one (21) years of age, and I am fully competent to testify to the matters set forth herein. I make this Declaration upon my own personal knowledge of the facts involved and as the records custodian for the documents at issue in this action, and I have personal knowledge of the matters set forth below.

2. I am currently employed by Portfolio Recovery Associates, LLC ("PRA") as Custodian of Records.

3. As Custodian of Records for PRA, I am familiar with the operations and record-keeping of PRA. Specifically, I am familiar with, and have access to, documents evidencing transactions between GE Money Bank and PRA. I also have access to PRA's records relating to PRA Account No. [REDACTED] 4523 (the "Account"), the account at issue in the above matter.

4. Part of my job duties include signing affidavits on behalf of PRA that contain information related to an account held by PRA, such as the debtor's name, the account number, assignment information, account balance, and/or payment history.

5. As a general practice, before signing an affidavit, I review all of the information contained in the affidavit and also review PRA's business records for the account at issue, including any account documents received from the assignor of the account. I confirm that information in an affidavit matches with PRA's business records before signing the affidavit. If information in an affidavit conflicts with PRA's business records, I will not sign the affidavit. I only sign affidavits if the information contained therein matches with the information in PRA's business records. I sign all affidavits in front of a notary.

6. On or about October 6, 2010, I signed an Affidavit of Ownership and Sale of Claim (the "Affidavit") relating to the Account of Ray Whitson and Ellisa Whitson (the "Whitsons"). The Affidavit is attached hereto as Exhibit 1.

7. Before signing the Affidavit, I reviewed the information contained therein and also reviewed PRA's business records for the Account. Specifically, I reviewed the Bill of Sale, PRA's internal collection notes for the Account, and electronic account information contained on PRA's system (including the account number, name, amount of the debt, and date of sale and other information transferred from GE Money Bank, F.S.B.).

8. The business records of PRA that I reviewed indicated that Ray Whitson and Ellison Whitson were the debtors on account number [REDACTED] 4523, that GE Money Bank, F.S.B. assigned the Account to PRA on February 25, 2010, and that, at the time the Account was assigned, there was a balance of \$3,581.15 on the Account. The business records of PRA that I reviewed also indicated that the last payment on the Account was made on May 13, 2008 in the amount of \$100.00 and that prior to filing suit, PRA mailed Plaintiffs four letters about the Account and that the letters were not returned or undeliverable.

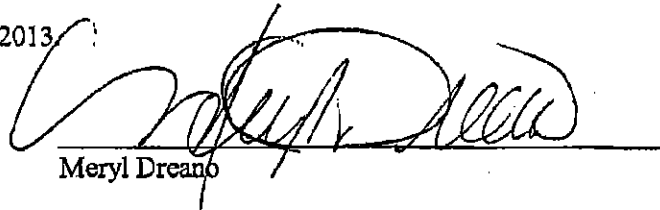
9. In reviewing the Affidavit and PRA's business records for the Account, I determined that the information contained in the Affidavit matched the information contained in PRA's business records.

10. I signed the Affidavit in front of notary Retha Y. Gray.

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I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 12th day of April, 2013.



Meryl Dreano

# EXHIBIT 1

**AFFIDAVIT OF OWNERSHIP AND SALE OF CLAIM**

State of Virginia  
City of Norfolk ss:

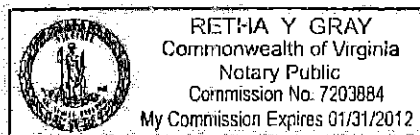
I, the undersigned, Meryl Dreano, Custodian of Records, for Portfolio Recovery Associates, LLC hereby depose, affirm and state, to the best of my understanding and belief:

1. I am an authorized employee of Portfolio Recovery Associates, LLC, ("Account Assignee") which is doing business at Riverside Commerce Center, 120 Corporate Boulevard, Norfolk, Virginia, and I am authorized to make the statements, representations and averments herein.
2. According to the account records provided to the Account Assignee by GE MONEY BANK, F.S.B. ("Account Seller"), there was due and payable from WHITSON, RAY ("Debtor") to the Account Seller the sum of \$ 3,581.15 with respect to account number [REDACTED] 4523, as of 02/25/10.
3. According to the account records of the said Account Assignee, which account records are maintained in the ordinary course of business, the account, and all proceeds of the account, are now owned by the Account Assignee, all of the Account Seller's interest in such account having been sold, assigned and transferred by the Account Seller on 02/25/10. Further, the Account Assignee has been assigned all of the Account Seller's power and authority to do and perform all acts necessary for the settlement, satisfaction, compromise, collection or adjustment of said account, and the Account Seller has retained no further interest in said account or the proceeds thereof, for any purpose whatsoever. At the time of the sale and assignment of the said account by the Account Seller, there was due and owing the sum of \$ 3,581.15, there being no known un-credited payments, just counterclaims or offsets against the said debt as of the date of the sale.

Portfolio Recovery Associates, L.L.C.

By: Meryl Dreano Custodian of Records

Subscribed and sworn to before me on 10/06/10



This communication is from a debt collector and is an attempt to collect a debt.  
Any information obtained will be used for that purpose.

[REDACTED] 4523

ATYTN3